

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS (Worcester)

Anthony Campbell, )  
 )  
 Plaintiff, )  
 vs. )  
 )  
 Isolation Technologies, Inc. )  
 Larry D'Amato )  
 Defendants )  
 )  
 Case No. 04-40236 FDS

**AFFIDAVIT OF WILLIAM M. ZALL IN SUPPORT OF DEFENDANT, ISOLATION**  
**TECHNOLOGIES, INC. SUPPLEMENTAL BRIEF**  
**TO MOTION FOR SANCTION OF DISMISSAL**

I, William M. Zall, hereby depose and state as follows:

1. I am an attorney duly licensed to practice law in the Commonwealth of Massachusetts and counsel of record for the Defendant, Isolation Technologies, Inc. ("Isolation") in the above-referenced matter.
2. On July 25, 2006, I received an envelope from the Plaintiff, sent via certified mail, containing **only** the following documents:
  - a. a letter from the Plaintiff, dated 7/22/06, addressed to Mr. Martin Castles (docketed as Document 47), attached hereto as Exhibit 1;
  - b. a document signed by the Plaintiff, dated 7/22/06, purporting to confirm compliance with the discovery order, attached hereto as Exhibit 2;
  - c. the Plaintiff's following tax returns:  
2003, IRS Form 1040 (unsigned)  
2002, IRS Form 1040 (unsigned)  
2001, IRS Form1040EZ (unsigned)  
2000, IRS Form 1040A (signed by preparer only)  
1999, IRS Form 1040A (signed by preparer only)

Signed under the pains and penalties of perjury this 27<sup>th</sup> day of July, 2006.



\_\_\_\_\_  
William M. Zall, BBO#554135  
Cunningham, MacHanic Cetlin,  
Johnson & Harney, LLP  
220 North Main Street  
Natick, MA 01760  
Tel: (508) 651-7524  
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**EXHIBIT  
1**

P.O. BOX 3469  
Worcester, MA 01613

July 22, 2006

CERTIFIED MAIL NO: 7004 2510 0002 5225 6799

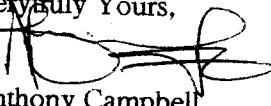
Mr. Martin Castles  
Deputy Clerk  
United States District Court  
For the District Of Massachusetts  
Harold D. Donohue Federal Building  
595 Main Street  
Worcester, MA 01608

**RE: Anthony Campbell v. Isolations Technologies  
C.A. NO: 04-40236 FDS.**

Dear Mr. Castles:

Please find enclosed copies of TAX RETURNS & PAST EMPLOYEMNTS prior to working at Isolations Technologies and after.

Thank you.

Very truly Yours,  
  
Anthony Campbell

Plaintiff

cc: Mr. William Zall  
Cunningham, Mechanic, Cetlin, Johnson & Harney, LPP  
220 North Main Street  
Natick , MA 01760

enclosures:

**EXHIBIT  
2**

UNITED STATES DISTRICT COURT  
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Anthony Campbell ..... Plaintiff )  
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 )  
 Isolations Technologies ..... Defendant )

PLAINTIFF, ANTHONY CAMPBELL, IS IN COMPLIANCE WITH THE COURT ORDER OF APRIL 26, 2006 AND MAY 10, 2006 AND JULY 10, 2006 BY HON. TIMOTHY HILLMAN AND HON. F. DENNIS SAYLOR, IV, TO PROVIDE TAX RETURNS TO THE DEFENDANT.

I, Anthony Campbell, Plaintiff hereby complied with the Court Order of April 26, 2006, by the Hon. Timothy Hillman, U.S. Magistrate/Judge, to provide documents to the defendant, and Court Order of May 10, 2006 and July 10, 2006 by Hon. F. Dennis Saylor, IV, U.S. District Judge to provide TAX RETURNS DOCUMENTS BY JULY 25, 2006 to the defendant.

## 1. TAX RETURNS.

## 2. PAST EMPLOYMENTS.

Respectfully submitted by,

Anthony Campbell  
Plaintiff

July 22, 2006

This copy was mailed CERTIFIED NO: 7004 2510 0002 5225 6782 to Mr. William Zall, Cunningham, Machanic, Cetlin, Johnson & Harney, LPP, 220 North Main Street, Natick, MA 01760.